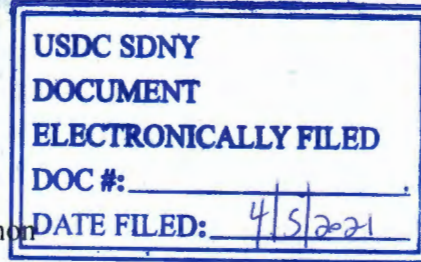


WILMERHALE

April 1, 2021

VIA ECF

The Honorable Colleen McMahon
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007



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MEMO ENDORSED

Re: *United States v. Michael Carroll, et al.*, No. 19-cr-545 (CM)

Dear Chief Judge McMahon:

On behalf of defendant Michael Carroll in the above-captioned case, I write to respectfully request that the Court lift Mr. Carroll's pretrial bail conditions and, pursuant to Federal Rule of Criminal Procedure 46(g), exonerate the bond posted in light of the Court's entry of an order of *nolle prosequi* as to Mr. Carroll (ECF No. 92).

On August 1, 2019, the Court granted Mr. Carroll bail pending trial subject to certain conditions, which included: an \$1,000,000 personal recognizance bond, co-signed by one financially responsible person and secured by Mr. Carroll's personal property; the surrender of all passports; domestic travel limitations; supervision at the discretion of the Probation Department; and all other standard conditions of pretrial release. *See* ECF No. 6.

On April 1, 2021, the Court entered an order of *nolle prosequi* with respect to the indictment in this action. ECF No. 92.

Accordingly, Mr. Carroll respectfully requests that the Court lift his bail conditions and exonerate his posted bond.

4/5/2021
Bail exonerated - lifted
all conditions
Cplu 2/1/21
CT

WILMERHALE

April 1, 2021

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Respectfully submitted,

/s/ Peter G. Neiman

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